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AIR ENFORCEMENT BRANCH
U.S. EPA. REGION 5

February 13, 2007

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Chief, Environmental Enforcement Section
Environmental & Natural Resources Division,
DJ#90-5-2-1-06894
U.S. Department of Justice
P.O. Box 7611, Ben Franklin Station
601 D Street, NW, Room 2121
Washington, District of Columbia 20044-7611

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New York State Attorney General's Office
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New York, New York 10271

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Administrator, Air & Environmental Quality
Compliance & Enforcement
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401 East State Street, Floor 4
Trenton, New Jersey 08625

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Section Chief
Environmental Enforcement Section
Division of Law
Richard J. Hughes, Justice Complex
25 Market Street
P.O. Box 093
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Department Head
Environmental Department
State of Connecticut
Office of the Attorney General
55 Elm Street
Hartford, Connecticut 06106

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Bureau Chief, Air Bureau
State of Connecticut
Department of Environmental Protection
79 Elm Street
Hartford, Connecticut 06106

Gentlemen and Ladies:

Re: Submittal of Third Semiannual Progress Report Pursuant Paragraph 141 of the
Consent Decree, Entered in Civil Action No. C2-99-1181

Ohio Edison Company (OE) submits its semiannual progress report for the period
January 1, 2006 through December 31, 2006, as required by paragraph 141 of the C^r

Appendix (B)(I)(A) Installation of NO_x and SO₂ Equipment

Project	Construction Schedule	Date of Contract Execution	Major Component Delivery	Estimated Percentage Complete	Estimated Construction Completion	Date of Final Installation	Acceptance Test
SA 1-2, 4-7 Low-NO _x Burners				100 %		In-service prior to Consent Decree	
SA 1-2, 4, 6-7 Overfired Air				100 %		In-service prior to Consent Decree	
SA 1-5 Combustion Optimization	See attached Schedule	4/14/05	All Equipment Received	100%		11/2/05	N/A
SA 1 SNCR	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%		6/16/06	N/A
SA 2 SNCR				100%		In-service prior to Consent Decree	
SA 3 SNCR	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%		11/07/05	N/A
SA 4 SNCR	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%		5/19/06	N/A
SA 5 SNCR	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%		4/28/06	N/A
SA 6 SNCR		N/A – FE General Contractor	All Equipment Received	100%		6/3/05	N/A
SA 7 SNCR				100%		In-service prior to Consent Decree	
SA 6 SCR	See attached Schedule	January 2005	Catalyst 4 th Quarter 2008	20%	5/30/09	9/20/09	N/A
SA 7 SCR	See attached Schedule	January 2005	Catalyst 4 th Quarter 2009	15%	3/27/10	7/30/10	N/A
SA 1-4 SO ₂ Removal System	See attached Schedule	8/26/05	9/15/08	5%	11/12/09	7/30/10	9/1/10
SA 5 SO ₂ Removal System	See attached Schedule	8/26/05	9/15/08	5%	12/31/09	9/30/10	11/30/10
SA 6 & 7 SO ₂ Removal System	See attached Schedule	8/26/05	9/15/08	5%	12/31/09	9/30/10	11/30/10

Project	Construction Schedule	Date of Contract Execution	Major Component Delivery	Estimated Percentage Complete	Estimated Construction Completion	Date of Final Installation	Acceptance Test -
MN 1 Scrubber Upgrades	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%		12/3/05	6/1/06
MN 2 Scrubber Upgrades	See attached Schedule	N/A – FE General Contractor	All Equipment Received	100%	12/2/06	11/8/06	6/30/07
MN 3 Scrubber Upgrades	See attached Schedule	N/A – FE General Contractor	6/29/07	10%	11/10/07	11/10/07	3/31/08
EL 5 Low-NO _x Burners, Overfired Air				100%		In-service prior to Consent Decree	
EL 5 SNCR	See attached Schedule	N/A – FE General Contractor	All Equipment Received	95%	2/26/07	2/26/07	N/A
Burger 4 SNCR	See attached Schedule	N/A – FE General Contractor	3/28/08	1%	5/16/08	5/16/08	N/A
Burger 5 SNCR	See attached Schedule	N/A – FE General Contractor	3/28/08	1%	5/31/08	5/31/08	N/A

Appendix (B)(I)(B) 30-Day Rolling Average Emission Rates for NO_x and SO₂

CD Paragraph 56:

1. The Sammis Unit 2 NO_x 30-Day Rolling Average Emission Rate (lb/mmBtu) is attached for the period July 1, 2006 through December 31, 2006.
2. There were no deviations of the Sammis Unit 2 NO_x 30-Day Rolling Average Emission Rate during the period.
3. Sample calculations previously submitted.
4. Sammis Unit 2 Startup and Shutdown.

Date and Time Fuel Combusted – SA-2	Date and Time Synchronized - SA-2	Date and Time Fire Extinguished – SA-2	Fifth and Subsequent Cold Startup Period Within 30-Day Period
None to report	None to report		

Appendix (B)(I)(C) PM Emission Rates

CD Paragraph 112: Nothing to report.

Appendix (B)(I)(D) Plant-Wide Annual Cap and Monthly Cap

CD Paragraph 69: OE complied with the Plant-Wide Annual Cap for the Sammis Plant for NO_x, which applies collectively to all units within the Sammis Plant for the period January 1, 2006 through December 31, 2006. The Plant-Wide Annual Cap was 21,251 tons, and the actual emissions for this period were 20,592 tons.

CD Paragraph 70: Compliance with the Plant-Wide Annual Cap for the period January 1, 2006 through December 31, 2006 was determined by calculating actual annual emissions during all periods of operation from the Sammis Plant using CEMS.

CD Paragraph 93: OE complied with the Plant-Wide Annual Cap for the Sammis Plant for SO₂, which applies collectively to all units within the Sammis Plant for the period January 1, 2006 through December 31, 2006. The Plant-Wide Annual Cap was 116,000 tons, and the actual emissions for this period were 86,392 tons.

CD Paragraph 94: Nothing to report.

CD Paragraph 95: Compliance with the Plant-Wide Annual Cap for the period January 1, 2006 through December 31, 2006 was determined by calculating actual annual emissions during all periods of operation from the Sammis Plant using CEMS.

Appendix (B)(I)(E) Additional Reductions

CD Paragraph 91: OE complied with the requirement to demonstrate the Mansfield Unit 1 FGD Removal Efficiency. The Removal Efficiency requirement was 95%, and the actual Removal Efficiency was 96.5%. Compliance with the Removal Efficiency requirement for the period January 1, 2006 through December 31, 2006 was determined by a performance test conducted on May 31 and June 1, 2006. See attached performance test summary.

CD Paragraph 92: OE complied with the Additional Mansfield Plant SO₂ Reductions for Mansfield Unit 1 for the period January 1, 2006 through December 31, 2006. The Additional Mansfield SO₂ Reductions required were 4,000 tons, and the actual reductions were 10,073 tons.

Appendix (B)(I)(F) Interim Reductions for NO_x and SO₂

CD Paragraph 72: OE achieved interim NO_x emission reductions of 659 tons by emitting fewer tons than the Plant-Wide Annual Cap for NO_x emissions at the Sammis Plant for the period January 1, 2006 through December 31, 2006. In addition, OE achieved interim NO_x emission reductions of 523 tons by using a low-sulfur coal at Burger Units 4 and 5 January 1, 2006 through December 31, 2006. OE has now achieved 1,287 tons of the 2,483 tons Interim NO_x Emission Reductions required by CD Paragraph 72.

CD Paragraph 97: OE achieved interim SO₂ emission reductions of 15,586 tons by using a low-sulfur coal at Burger Units 4 and 5. OE has achieved 15,586 tons of the 35,000 tons required by CD Paragraph 97.

CD Paragraph 98 – OE achieved interim SO₂ emission reductions of 29,608 tons by emitting fewer tons than the Plant-Wide Annual Cap for SO₂ emissions at the Sammis Plant for the period January 1, 2006 through December 31, 2006.

Appendix (B)(I)(G) Surrender of Restricted SO₂ Allowances

Nothing to report.

Appendix (B)(I)(H) Generation of Super-Compliant Allowances

Nothing to report.

Appendix (B)(I)(I) NO_x System-Wide Annual Emission Rate

Nothing to report.

Appendix (B)(I)(J) Environmentally Beneficial Projects

1. Cash Contributions

Date of Payment	Recipient	Amount Paid (dollars)
Nothing to report		

2. Renewable Energy Development Projects

Date of Execution	Megawatts	Location	Projected Commencement of Operation	Description
3/21/06	16	Cambria County, PA	3/15/07	Wind turbine purchase power agreement for 23-year term entered into by FES, an affiliate of OE (agreement previously submitted)

Appendix (B)(II) Deviation Reports

Nothing to report.

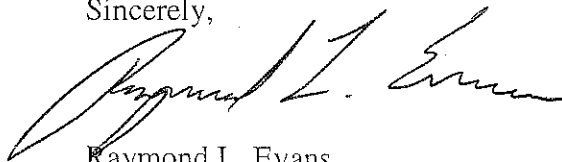
Appendix (B)(III) Ohio Edison Submissions

Date Submitted	Plans/Submissions	Pending Review and Approval
7/13/06	Notification	N/A
8/10/06	Dispute Resolution	Pending Approval
12/7/06	Notification	N/A

Certification

"This information was prepared either by me or under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my evaluation, or the direction and my inquiry of the person(s) who manages the system, or the persons(s) directly responsible for gathering the information, I hereby certify under penalty of law that, to the best of my knowledge and belief, this information is true, accurate, and complete. I understand that there are significant penalties for submitting false, inaccurate, or incomplete information to the United States."

Sincerely,



Raymond L. Evans
Manager,
Environmental Controls and Monitoring

Attachments
By UPS Next Day Air

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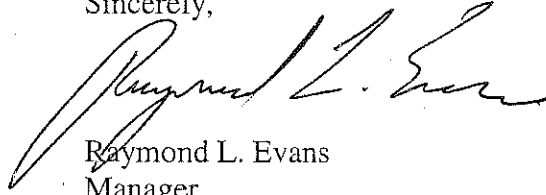
Re: Ohio Edison Company Consent Decree Notification

We are resubmitting a substitute compliance plan in accordance with paragraph 62 of the Consent Decree due to a planned outage of Eastlake Unit 5 scheduled to commence January 1, 2007, and expected to end March 12, 2007. This is in response to your letter of August 10, 2006.

We propose to achieve up to 2,300 tons of Additional Eastlake Plant NO_x Reductions from the FirstEnergy Generation Corp. system. We anticipate these reductions will occur during 2007 at Mansfield Unit 3 through the use of SCR NO_x control technology installed in 2004. The Additional Eastlake Plant NO_x Reductions from Mansfield Unit 3 shall be calculated based on that unit's actual emission rate (lb/mmBtu) as compared to the 2003 actual emission rate (lb/mmBtu) per the continuous emissions monitoring system.

Please call if you need further information regarding this plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond L. Evans". The signature is fluid and cursive, with a large initial "R" and "E".

Raymond L. Evans
Manager,
Environmental Controls and Monitoring

By UPS Next Day Air

February 13, 2007

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Environmental & Natural Resources Division,
DJ#90-5-2-1-06894
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Department of Environmental Protection
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Gentlemen and Ladies:

Re: Ohio Edison Company Consent Decree Notification

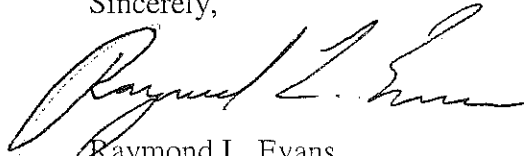
In accordance with paragraph 98 of the Consent Decree, we submit this plan to achieve a reduction of SO₂ emissions from the FirstEnergy system in the amount of 24,600 tons. More specifically, we propose to reduce SO₂ emissions by emitting fewer tons than the Sammis Plant-

Page 2
February 13, 2007

Wide Annual Cap for SO₂ required under Paragraph 93. Beginning with calendar year 2006, we have achieved 29,608 tons required by paragraph 98 of the Consent Decree.

Please call if you need further information regarding this plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond L. Evans". The signature is fluid and cursive, with a large initial "R" and "E".

Raymond L. Evans
Manager,
Environmental Controls and Monitoring

By UPS Next Day Air



First Energy
76 South Main Street
Akron, Ohio 44308

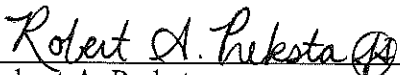
**REPORT ON THE DETERMINATION OF
SULFUR DIOXIDE REMOVAL EFFICIENCY**

Performed for:
**FIRST ENERGY
BRUCE MANSFIELD STATION
UNIT 1**


Client Reference No: 45195517
CleanAir Project No: 9941
PA Registered Environmental Laboratory No.: 2-760
Revision 0: July 5, 2006
Revision 1: July 17, 2006

To the best of our knowledge, the data presented in this report are accurate, complete, error free, legible and representative of the actual emissions during the test program.

Submitted by,


Robert A. Preksta
Project Manager
bpreksta@cleanair.com
(800) 632-1619 ext. 230

Reviewed by,


Timothy D. Rodak
Manager, Pittsburgh Regional Office
trodak@cleanair.com
(800) 632-1619 ext. 225

FIRST ENERGY
BRUCE MANSFIELD STATION

Client Reference No: 45195517
CleanAir Project No: 9941

PROJECT OVERVIEW

1-2

Table 1-2:
Summary of Test Results

Source	Constituent	Sampling Method	Average Emission
<u>Unit 1 Potential SO₂ Emissions (Calculated)</u>			
	SO ₂ (lb/hr) ¹	EPA M19	41,979
	SO ₂ (lb/hr) ²	EPA M19	42,078
	SO ₂ (lb/MMBtu) ³	EPA M19	4.78
<u>Unit 1 SO₂ Emissions (Measured)</u>			
Unit 1A Stack Measured Emissions			
	SO ₂ (lb/hr)	EPA M8	655
	SO ₂ (lb/MMBtu)	EPA M8	0.1542
Unit 1B Stack Measured Emissions			
	SO ₂ (lb/hr)	EPA M8	762
	SO ₂ (lb/MMBtu)	EPA M8	0.1841
Total Measured SO ₂ Emitted from Unit			
	SO ₂ (lb/hr)	EPA M8	1,417
	SO ₂ (lb/MMBtu)	EPA M8	0.1691
<u>Unit 1 SO₂ Removal Efficiency</u>			
	RE (Based on lb/hr) ¹	EPA M8/19	96.6%
	RE (Based on lb/hr) ²	EPA M8/19	96.6%
	RE (Based on lb/MMBtu) ³	EPA M8/19	96.5%

¹ Potential mass emission of sulfur dioxide based on fuel (coal) analysis and heat input.

² Potential mass emission of sulfur dioxide calculated from fuel (coal) flow and sulfur analysis.

³ Potential mass emission of sulfur dioxide calculated from fuel (coal) analysis.

February 13, 2007

Via Express Delivery

Robert Rosenthal, Esq.
Assistant Attorney General
New York State Attorney General's Office
The Capitol
New York, NY 12224-0341

Dear Mr. Rosenthal:

Thank you for your letter of February 2, 2007. We appreciate the additional information you have provided us regarding New York's proposed Green Affordable Housing Project. We continue to have concerns about the Project you are proposing, however. Our concerns stem primarily from the fact that, at this point, the environmental benefits of the Project, if any, are entirely theoretical and speculative.

In my January 11, 2007 letter, I requested information concerning the terms of the incentives you propose to provide, any qualification procedures that will be utilized, and any verification process. You did not provide that information. Instead, you admitted that you do not yet know these Project details.

Your February 2, 2007 letter acknowledges that you do not now know "which green building measures will be eligible for funding" or the "appropriate funding levels" for your Project. Because your Green Affordable Housing Project is still in the preliminary proposal stage, the environmental benefits of your Project are unknowable. Thus, as of this time New York has not fulfilled its obligation to "submit environmentally beneficial projects to Ohio Edison for funding," as required by Paragraph 129 of the Consent Decree. We believe that New York also has an obligation to spend funds from Ohio Edison for "environmentally beneficial projects" consistent with the notification required by Paragraph 129 of the Decree.

Because we are days away from the February 15th deadline for payment set by the Decree, we have decided to make a payment of \$1.08 million to New York to avoid the potential

Mr. Robert Rosenthal
Page Two
February 13, 2007

civil penalties alluded to in your January 30, 2007 e-mail. We do so under protest, however, reserving the right to petition the Court for the return of some or all of these funds.

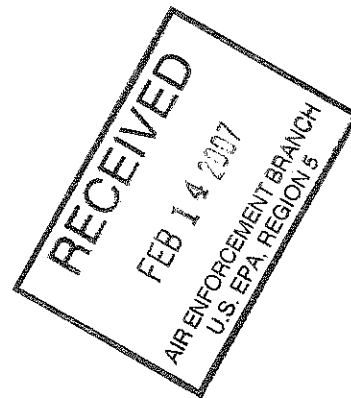
Sincerely,

A handwritten signature in cursive script, appearing to read "Douglas J. Weber".

Douglas J. Weber

DJW:dka

cc: Chief, Environmental Protection Bureau, NY State Attorney General's Office
Chief, Environmental Enforcement Section – U.S. Dept. of Justice
Director, Air Enforcement Division, U.S. E.P.A.
Air Enforcement & Compliance Assurance Branch, U.S. E.P.A. Region V
Administrator, Air & Environmental Quality Compliance & Enforcement, State of NJ
Section Chief, Environmental Enforcement Section, Division of Law, State of NJ
Dept. Head, Environmental Department, State of CT, Office of Attorney General
Bureau Chief, Air Bureau, State of CT, Dept. of Environmental Protection



David Schulz /R5/USEPA/US To

02/22/2007 04:37 PM

Subject OE letters and semi-annual report

Following are a few comments wrt recent OE correspondence- we should discuss:

2/13/07 letter re: par 62- OE proposes 2,300 TPY NOx reduction from Mansfield 3 due to SCR operation as partial offset to 11,000 TPY reduction from Eastlake 5 (due to extended outage). It appears, from my reading of par. 63 that only 1,000 TPY can be met elsewhere, not the 2,300 OE proposes- in addition, OE doesn't indicate how this amount will be met, but we should assure it's due to operation of the SCR outside the O3 season, since they're obligated to operate during the O3 season anyway.

2/13/07 letter re: par. 98- OE proposes meeting additional 24,600 tons SO2 reduction thru 2006 operation below the Sammis cap- I question this since they are just now proposing this as their option- I believe it must be emissions achieved after proposal and approval of their plan.

2/13/07 letter re: NY env. beneficial project- OE is submitting payment to NY but asking for documentation of environmental benefit. We should see a copy of such documentation from NY as well.

2/13/07 semiannual report- OE has met SNCR installation requirements for Sammis 1, 3, 4, 5, 6 - we should however, require verification that the SNCR's are being continuously operated as required by pars. 57- 59. OE appears to be meeting cap and unit limits currently in effect.

Let's discuss when we can schedule an agreed time. Thanks, Dave

Please do your part to reduce global warming. Protecting the environment is everyone's responsibility.

Page: 1

Plant Name: Sammis

Daily Rolling Average Report
Reporting Period: 07/01/2006 to 12/31/2006
Time of Report: 02/01/07 14:24

Site Name: Boiler 2
Rolling Average Interval: 30 days

Date	NOX#/MM2 (LB/MMBTU)
07/01/06	0.181
07/02/06	0.182
07/03/06	0.183
07/04/06	0.184
07/05/06	0.184
07/06/06	0.184
07/07/06	0.183
07/08/06	0.183
07/09/06	0.184
07/10/06	0.185
07/11/06	0.186
07/12/06	0.189
07/13/06	0.191
07/14/06	0.193
07/15/06	0.195
07/16/06	0.196
07/17/06	0.198
07/18/06	0.199
07/19/06	0.199
07/20/06	0.200
07/21/06	0.200
07/22/06	0.200
07/23/06	0.199
07/24/06	0.201
07/25/06	0.202
07/26/06	0.203
07/27/06	0.203
07/28/06	0.203
07/29/06	0.205
07/30/06	0.206
07/31/06	0.206
08/01/06	0.207
08/02/06	0.210
08/03/06	0.212
08/04/06	0.213
08/05/06	0.214
08/06/06	0.215
08/07/06	0.216
08/08/06	0.217
08/09/06	0.217
08/10/06	0.217
08/11/06	0.216
08/12/06	0.215
08/13/06	0.214
08/14/06	0.214

* - invalid
> - exceedance
N - stack not operating or no QA operating time parameter
blank value indicates missing daily average record

Page: 2

Plant Name: SMSN

Daily Rolling Average Report
Reporting Period: 07/01/2006 to 12/31/2006
Time of Report: 02/01/07 14:24

Site Name: BLR2P
Rolling Average Interval: 30 days

Date	NOX#/MM2 (LB/MMBTU)
08/15/06	0.213
08/16/06	0.212
08/17/06	0.212
08/18/06	0.211
08/19/06	0.211
08/20/06	0.209
08/21/06	0.210
08/22/06	0.210
08/23/06	0.210
08/24/06	0.211
08/25/06	0.211
08/26/06	0.212
08/27/06	0.211
08/28/06	0.210
08/29/06	0.210
08/30/06	0.209
08/31/06	0.207
09/01/06	0.205
09/02/06	0.204
09/03/06	0.203
09/04/06	0.203
09/05/06	0.203
09/06/06	0.202
09/07/06	0.203
09/08/06	0.203
09/09/06	0.203
09/10/06	0.203
09/11/06	0.203
09/12/06	0.204
09/13/06	0.204
09/14/06	0.205
09/15/06	0.205
09/16/06	0.206
09/17/06	0.206
09/18/06	0.206
09/19/06	0.207
09/20/06	0.208
09/21/06	0.208
09/22/06	0.209
09/23/06	0.207
09/24/06	0.206
09/25/06	0.206
09/26/06	0.207
09/27/06	0.208
09/28/06	0.208

Page: 3

Plant Name: SMSN

Daily Rolling Average Report
Reporting Period: 07/01/2006 to 12/31/2006
Time of Report: 02/01/07 14:24

Site Name: BLR2P
Rolling Average Interval: 30 days

Date	NOX#/MM2 (LB/MMBTU)
09/29/06	0.208
09/30/06	0.207
10/01/06	0.206
10/02/06	0.207
10/03/06	0.208
10/04/06	0.208
10/05/06	0.208
10/06/06	0.208
10/07/06	0.209
10/08/06	0.210
10/09/06	0.211
10/10/06	0.211
10/11/06	0.212
10/12/06	0.212
10/13/06	0.213
10/14/06	0.213
10/15/06	0.212
10/16/06	0.213
10/17/06	0.214
10/18/06	0.214
10/19/06	0.215
10/20/06	0.216
10/21/06	0.215
10/22/06	0.214
10/23/06	0.215
10/24/06	0.215
10/25/06	0.216
10/26/06	0.216
10/27/06	0.215
10/28/06	0.215
10/29/06	0.215
10/30/06	0.216
10/31/06	0.217
11/01/06	0.218
11/02/06	0.218
11/03/06	0.218
11/04/06	0.219
11/05/06	0.218
11/06/06	0.218
11/07/06	0.218
11/08/06	0.217
11/09/06	0.218
11/10/06	0.217
11/11/06	0.215
11/12/06	0.214

Plant Name: SMSN

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Daily Rolling Average Report
Reporting Period: 07/01/2006 to 12/31/2006
Time of Report: 02/01/07 14:24

Site Name: BLR2P
Rolling Average Interval: 30 days

Date	NOX#/MM2 (LB/MMBTU)
11/13/06	0.214
11/14/06	0.215
11/15/06	0.214
11/16/06	0.213
11/17/06	0.213
11/18/06	0.212
11/19/06	0.211
11/20/06	0.211
11/21/06	0.212
11/22/06	0.212
11/23/06	0.211
11/24/06	0.210
11/25/06	0.209
11/26/06	0.208
11/27/06	0.208
11/28/06	0.208
11/29/06	0.208
11/30/06	0.208
12/01/06	0.208
12/02/06	0.209
12/03/06	0.208
12/04/06	0.208
12/05/06	0.208
12/06/06	0.208
12/07/06	0.208
12/08/06	0.208
12/09/06	0.207
12/10/06	0.206
12/11/06	0.207
12/12/06	0.207
12/13/06	0.207
12/14/06	0.207
12/15/06	0.207
12/16/06	0.206
12/17/06	0.205
12/18/06	0.205
12/19/06	0.206
12/20/06	0.205
12/21/06	0.205
12/22/06	0.205
12/23/06	0.205
12/24/06	0.207
12/25/06	0.207
12/26/06	0.208
12/27/06	0.208

* - invalid
> - exceedance
N - stack not operating or no QA operating time parameter
blank value indicates missing daily average record

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Plant Name: SMSN

Daily Rolling Average Report
Reporting Period: 07/01/2006 to 12/31/2006
Time of Report: 02/01/07 14:24

Site Name: BLR2P
Rolling Average Interval: 30 days

Date	NOX#/MM2 (LB/MMBTU)
12/28/06	0.208
12/29/06	0.207
12/30/06	0.206
12/31/06	0.204
